

BellSouth Telecommunications, Inc
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

Guy M. Hicks
General Counsel

615 214 6301
Fax 615 214 7406

October 14, 2005

VIA HAND DELIVERY

Hon. Ron Jones, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

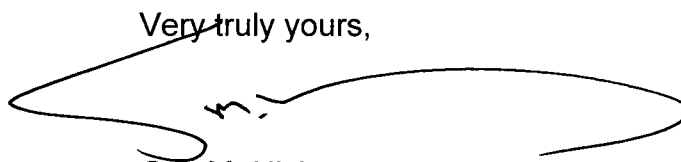
Re *Petition to Establish Generic Docket to Consider Amendments to
Interconnection Agreements Resulting from Changes of Law*
Docket No. 04-00381

Dear Chairman Jones:

Enclosed are BellSouth's non-proprietary responses to the Authority's Data Requests.

Copies of the enclosed have been provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH nc

RECEIVED
2005 OCT 14 PM 4:21
T.R.A. DOCKET ROOM

REQUEST: With regard to request for negotiations related to changes of law, please provide the following:

- (a) A list of the dates that BellSouth issued requests for negotiations regarding the TRO, Interim Order, and TRRO and tie each request date to the respective order;
- (b) A sample of each request for notification identified in (a) above;
- (c) The number of carriers to whom each respective request for notification was sent;
- (d) A list of carriers that do not have TRO/TRRO amendments; and
- (e) A list of carriers, doing business in Tennessee, that have not responded to any request for negotiations identified in (a) above.

RESPONSE: (a) BellSouth issued requests for negotiations to all CLECs with existing Interconnection Agreements as follows:

- For the TRO, requests were issued during the period of October 20, 2003 to January 13, 2004.
- For the Interim Order, requests were issued during the period of September 22, 2004 to October 31, 2004.
- For the TRRO, requests were issued during the period of March 14, 2005 to March 30, 2005.

BellSouth is providing copies of letters in Attachment No 1(a).

BellSouth also posted to its interconnection website, www.Interconnection.bellsouth.com, a number of Carrier Notification Letters ("CNLs") requesting negotiations. With respect to interconnection agreement negotiations, BellSouth also includes in Attachment No. 1(a) a copy of its June 16, 2005 CNL which notified all CLECs that this docket, and other change of law dockets, were pending in each of the nine BellSouth states.

RESPONSE (Cont'd):

BellSouth also includes copies of the following CNLs that requested negotiations to reach commercial agreements and transition plans to all CLECs. These requests were issued as follows:

- For *USTA II*, CNLs were posted during the period of March 23, 2004 to June 15, 2004.
 - For the *TRRO*, CNLs were posted during the period of February 8, 2005 to March 10, 2005.
- (b) BellSouth is providing examples of notifications in Attachment No. 1(a). See Exhibit A for a TRO Letter Template, Exhibit B for an Interim Order Letter Template, Exhibit C for a TRRO Letter Template, and Exhibit D for BellSouth's June 16, 2005 CNL. BellSouth is providing copies of additional CNLs in Attachment No. 1(b).
- (c) BellSouth sent requests to 89 carriers for TRO, requests to 81 carriers for the Interim Order and requests to 89 carriers for TRRO.
- (d) Following is a list of carriers that do not have TRO/TRRO compliant Amendments:

Access Integrated Networks, Inc.
Access Point, Inc.
ACN Communications Services, Inc.
Adelphia Business Solutions Operations, Inc.
Adelphia Business Solutions of Nashville, LP
Aeneas Communications, LLC
ALEC, Inc.
American Farm Bureau, Inc.
American Fiber Systems, Inc.
AT&T Communications of the South Central States, LLC

RESPONSE (Cont'd):

Big River Telephone Company, LLC
BLC Management, LLC
Brooks Fiber Communications of Tennessee, Inc.
BullsEye Telecom, Inc.
Business Telecom, Inc.
CenturyTel Fiber Company II, LLC
CenturyTel Solutions, LLC
CI2, Inc.
Cinergy Communications Company
Comm South Companies, Inc.
DIECA Communications, Inc.
Dixie-Net Communications, LLC
DSLnet Communications, LLC
East Tennessee Network, LLC
Electric Power Board of Chattanooga
Ernest Communications, Inc.
Excel Telecommunications, Inc.
EZ Phone, Inc.
Globe Telecommunications, Inc.
ICG Telecom Group, Inc.
IDS Telecom, LLC
Image Access, Inc.
Intermedia Communications, Inc.
ITC^DeltaCom Communications, Inc.
Knology of Tennessee, Inc.
LecStar Telecom, Inc.
Level 3 Communications, LLC
LoadPoint, LLC
Madison River Communications, LLC
Memphis Networkx
MCImetro Access Transmission Services, LLC
MCI WorldCom Communications, Inc.
McLeodUSA Telecommunications Services, Inc.

RESPONSE (Cont'd):

ITC^DeltaCom Communications, Inc.
Knology of Tennessee, Inc.
LecStar Telecom, Inc.
Level 3 Communications, LLC
LoadPoint, LLC
Madison River Communications, LLC
Memphis Networkx
MCImetro Access Transmission Services, LLC
MCI WorldCom Communications, Inc.
McLeodUSA Telecommunications Services, Inc.
Momentum Telecom, Inc.
Navigator Telecommunications, LLC
Network Telephone Corporation
New Edge Networks, Inc.
NewSouth Communications, Corp.
NOS Communications, Inc.
NuVox Communications, Inc.
OneStar Communications, LLC
Phone-Link, Inc.
Premiere Network Services, Inc.
SBC Telecom, Inc.
Southern Digital Network Inc.
Sprint Communications Company, L.P.
Talk America, Inc.
TCG MidSouth, Inc.
Teleconex, Inc.
Telepak Networks, Inc.
TeleSys, Inc.
Trinsic Communications, Inc.
US LEC of Tennessee, Inc.
USCarrier Telecom, LLC
VarTec Telecom, Inc.
Vo2 Networkx, Inc.
XO Communications Services, Inc.
Xspedius Communications, LLC

RESPONSE (Cont'd).

- (e) Following is a list of carriers, doing business in TN, that have not responded to any request for negotiations:

ALEC, Inc.
Access Point, Inc.
American Farm Bureau, Inc.
BLC Management, LLC
CenturyTel Solutions, LLC
CI2, Inc.
Dixie-Net Communications, LLC
Ernest Communications, Inc.
IDS Telecom, LLC
LecStar Telecom, Inc.
New Edge Networks, Inc.
OneStar Communications, LLC
Premiere Network Services, Inc.
Vo2 Networx, Inc.

REQUEST: Please provide a list of the "triggers" used by BellSouth to determine when an EELs audit is necessary, as mentioned in witness Tipton's testimony.

RESPONSE: The audits BellSouth has conducted thus far have been based on the FCC's pre-TRO "safe harbor" rules. In determining the necessity of an EELs audit based on the pre-TRO safe harbor rules, the factors considered by BellSouth include: the percentage of local traffic terminating to BellSouth, the CLEC has a history of misreporting jurisdictional factors, the CLEC has indicated to BellSouth representatives that it may be using its EELs for non-local traffic, third party information indicates non-compliance; the CLEC provisions primarily data or long distance service.

BellSouth is currently developing the factors to use in determining the necessity of an EELs audit based on the TRO's "service eligibility" requirements.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 04-00381
TRA's Data Requests
September 23, 2005
Item No. 3
Page 1 of 1

REQUEST. Please provide copies of all correspondence between BellSouth and the Federal Communications Commission (sent by either party) regarding the wire center inputs to the nonimpairment analysis for high capacity loops and transport.

RESPONSE. BellSouth is providing responsive information in Attachment No. 3. This is consistent with the Commission's acknowledgement of this data in setting the thresholds, in Paragraph 105 of the TRRO.

REQUEST: Please provide the dates that Bellsouth contacted CLECs about the BellSouth scheduling tool and provide a sample of the communications used for this purpose.

RESPONSE: The announcement for the introduction of the Bulk Migration Scheduling Tool was September 27, 2004, communicated through Carrier Notification SN91084241. The announcement of an enhancement to the Scheduling Tool was on August 19, 2005 through Carrier Notification SN91085159. See Attachment No. 4 for copies of both Carrier Notifications.

REQUEST: Please provide the total number of hot cuts to perform per wire center in Tennessee.

RESPONSE: BellSouth is providing information on the remaining embedded base of UNE-Ps in Tennessee that have not converted to a commercial agreement in Attachment No. 5. This information is proprietary and is being provided pursuant to the terms of the Tennessee Regulatory Authority protective order in this Docket and the parties' region-wide protective agreement.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 04-00381
TRA's Data Requests
September 23, 2005
Item No. 6
Page 1 of 1

REQUEST: Please provide the number of standalone switch-ports provisioned to CLECs in the state of Tennessee and include a breakdown by wire center and, if possible, by CLEC.

RESPONSE: BellSouth is providing responsive information in Attachment No. 6. This information is proprietary and is being provided pursuant to the terms of the Tennessee Regulatory Authority protective order in this Docket and the parties' region-wide protective agreement.

REQUEST: With respect to page 9 of the financial report entered into the record as Exhibit 20, please describe the process used by the preparers of that financial report to arrive at the business line figure of 6,053,000 and include all supporting documentation.

RESPONSE: The financial report entered into the record as Exhibit 20 (4Q04 Lines in Service) can be reconciled within 0.04% with the business line data used for TRRO purposes.

Exhibit 20 includes "company official" lines, i e., those lines used by BellSouth to conduct business. Line counts in Exhibit 20 also use an ISDN BRI multiplier of 2.5 versus a 2.0 multiplier for the ARMIS 43-08. BellSouth is providing Attachment No. 7, which shows the reconciliation between the ARMIS 43-08 business line counts and Exhibit 20.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 04-00381
TRA's Data Requests
September 23, 2005
Item No.1(a)

**ATTACHMENT
TO REQUEST NO. 1(a)**

**BellSouth Interconnection Services**

675 West Peachtree Street, NE
Room 34S91
Atlanta, Georgia 30375

BellSouth Contract Negotiator
(404) 927-XXXX
FAX 404 529-7839

Sent Via Electronic Mail and Certified Mail

EXHIBIT A

Date

CLEC Contact
CLEC
CLEC Address

Subject: Request for Interconnection Agreement Amendment between CLEC and BellSouth Telecommunications, Inc. in Compliance with Triennial Order

Dear CLEC Contact:

This letter is formal notice under the Interconnection Agreement between BellSouth Telecommunications, Inc. (BellSouth) and CLEC.

In its Report and Order and Order on Remand and Further Notice of Proposed Rulemaking (Triennial Order), effective October 2, 2003, the Federal Communications Commission (FCC) promulgated new rules and regulations pertaining to the availability of unbundled network elements pursuant to Section 251(c)(3) of the Telecommunications Act of 1996 (the "Act"). Pursuant to the Triennial Order, BellSouth's obligations under the Act have been materially modified in numerous aspects. Among other things, certain facilities that BellSouth was previously required to offer on an unbundled basis pursuant to Section 251(c)(3) are no longer subject to unbundling.

BellSouth makes this request pursuant to the change of law provisions contained in the parties' Interconnection Agreement that allows for the amendment of the agreement to incorporate new rules, such as those resulting from the Triennial Order. Pursuant to the change in law provisions of the Interconnection Agreement, the parties must complete negotiations of this amendment within ninety (90) calendar days of this notice. In the event that such new terms are not renegotiated within ninety (90) calendar days after such notice, the Dispute shall be referred to Resolution of Dispute procedure set forth in Section 10 of the General Terms and Conditions of this Agreement.

BellSouth's proposed Interconnection Agreement amendment is currently being composed and will be provided to you under separate cover.

Should you have any questions, please contact me at the number above.

Sincerely,

BellSouth Contract Negotiator Name
Manager, Interconnection Services



BellSouth Interconnection Services

675 West Peachtree Street, NE
Room 34S91
Atlanta, Georgia 30375

BellSouth Contract Negotiator
(404)-927-XXXX
Fax (404) 529-7839

Sent Via Email and Certified Mail

Date

EXHIBIT B

CLEC Contact
CLEC
CLEC Address

Dear CLEC Contact:

On August 20, 2004, the Federal Communication Commission (FCC) released its Order and Notice of Proposed Rulemaking (Order) in Docket 04-313. In its Order, the FCC, among other things, adopted interim transition requirements with respect to mass-market switching, high capacity dedicated transport, high capacity loops and dark fiber. The Order, effective September 13, 2004, does not reinstate those elements as UNEs, but provides access to those elements for existing CLECs on a temporary basis and during a transition period while the FCC crafts permanent UNE rules. Thus, as long as they are in effect, these interim rules currently govern BellSouth's obligation to provide these services.

BellSouth's proposed Amendment maintains mass market switching, high capacity loops, dedicated transport, and dark fiber from CLEC's Interconnection Agreement as it existed on June 15, 2004, for the period of six (6) months following the effective date of the Order and incorporates a subsequent transition period specified in the Order.

If you agree to BellSouth's proposal please print one full original Amendment and a duplicate signature page. The full original will become your file copy of the Amendment. Execute both original signature pages and return only those pages to my attention. These will be executed on behalf of BellSouth and I will return one fully executed original signature page to you for inclusion in your files. BellSouth will file the signed Amendment with the appropriate state commission(s). Alternatively, if you would like to discuss the amendment, please provide any concerns your company may have for BellSouth to review. BellSouth is ready to negotiate the proposed amendment in good faith.

BellSouth intends to pursue its legal, equitable and/or regulatory rights to ensure that the existing Interconnection Agreement between the parties is modified, reformed or amended in an expeditious manner to reflect the FCC's Order. By doing so, BellSouth is not expressing agreement with the Order, which is presently being challenged in court, and BellSouth reserves the right to modify this Amendment depending upon the outcome of this challenge.

Should you have any questions, please feel free to contact me.

Sincerely,

BellSouth Contract Negotiator Name
Manager - Interconnection Services

**BellSouth Interconnection Services**

675 West Peachtree Street, NE
Room 34S91
Atlanta, Georgia 30375

BellSouth Contract Negotiator
(404)-927-XXXX
Fax: (404) 529-7839

Sent Via Email and Certified Mail

EXHIBIT C

Date

CLEC Contact
CLEC
CLEC Address

Dear CLEC Contact:

On February 4, 2005, the Federal Communication Commission (FCC) released its Order on Remand in Docket 4-290 (Final Order). In its Final Order, the FCC eliminated unbundling requirements for local switching, dark fiber loops, and, in and between certain wire centers, high capacity loops and dedicated transport. The effective date of the Final Order is March 11, 2005.

In accordance with the Modification of Agreement Section of the Interconnection Agreement between CLEC and BellSouth, BellSouth is requesting to amend the Interconnection Agreement to incorporate the Final Order, including those portions of the Final Order that are self-effectuating and have already been implemented. (Delete the next two (2) sentences if CLEC has signed TRO Amendment) In addition, BellSouth has previously notified CLEC pursuant to the Interconnection Agreement that BellSouth requests an amendment to incorporate the FCC's Triennial Review Order, effective as of October 2, 2003, and subsequent FCC orders related thereto (TRO Orders). However, the parties have not yet incorporated the changes in law resulting from those TRO Orders.

In the next few days BellSouth will send a proposed amendment addressing the Final Order (Delete rest of sentence if CLEC has signed TRO Amendment) and the TRO Orders. (Delete this next sentence if CLEC has none of the four services) As you will note, in the body of the Amendment document there are sections that are not a part of our BellSouth Standard Attachment 2 but that address services CLEC is currently purchasing (UDC loop, ULC-Long loop, Line Sharing and ULC) and that therefore need to be included in your Agreement. Additionally, this Amendment contains minor modifications intended to reflect changes to update the Attachment. This proposed amendment will replace and supersede the previous amendment(s) related to the TRO Orders. Please print one full original Amendment and a duplicate signature page. The full original will become your file copy of the Amendment. Execute both original signature pages and return only those pages to my attention. These will be executed on behalf of BellSouth, and I will return one fully executed original signature page to you for inclusion in your files. BellSouth will file the signed Amendment with the appropriate state commission(s). Alternatively, if you would like to discuss the amendment, please provide me with any questions your company may have. BellSouth is ready to negotiate this proposed amendment in good faith.

BellSouth intends to pursue its legal, equitable and/or regulatory rights to ensure that the existing Interconnection Agreement between the parties is amended in an expeditious manner to reflect the above referenced orders. By doing so, BellSouth is not expressing agreement with

the Final Order, which is presently being challenged in court, and BellSouth reserves the right to modify this Amendment depending upon the outcome of this challenge.

To the extent that CLEC is interested in continued availability of BellSouth's local switching, BellSouth encourages CLEC to negotiate a commercial agreement with BellSouth. Other affected elements will continue to be available pursuant to BellSouth's tariffs.

Should you have any questions, please feel free to contact me.

Sincerely,

BellSouth Contract Negotiator Name
Manager - Interconnection Services



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

EXHIBIT D.**Carrier Notification
SN91085132**

Date: June 16, 2005

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Product/Service) - Triennial Review Remand Amendment

In response to various Federal Communications Commission (FCC) and court orders, each state public service commission (PSC) in BellSouth's nine-state territory, either on its own motion or in response to a request that it do so, has established a generic docket to address unresolved issues that may exist between BellSouth and the CLECs regarding the implementation of the FCC's Triennial Review Order (TRO) and the FCC's Triennial Review Remand Order (TRRO). While several state commissions have taken the affirmative step of requiring notice of such generic proceedings to all CLECs, others have not yet done so. BellSouth is requesting that the results of such generic proceedings be applicable to all CLECs that have not previously amended their Interconnection Agreements to be compliant with the TRO and TRRO.

To ensure that all CLECs are aware of the opportunity to raise TRO and TRRO issues in a timely manner, BellSouth is hereby providing notice of the open dockets in each state, the schedule that either has been adopted or proposed for each state, and the current list of issues that are pending in the generic proceedings. In addition, pursuant to Florida PSC Order No. PSC-05-0639-PCO-TP, dated June 14, 2005, and issued in Docket No. 041269-TP, each CLEC certificated in the state of Florida will be receiving a similar notice from the Florida PSC informing the CLECs of the open generic docket and inviting all CLECs to raise issues and otherwise participate in the proceeding.

The current issues list has been developed over the past several months as a result of negotiations between BellSouth and representatives of the CLEC community. BellSouth and the CLECs agreed that as the parties negotiated contract language to implement the TRRO and TRO, additional issues may arise that the parties failed to anticipate earlier in the negotiation process. Thus, BellSouth and the CLECs agreed that the parties are free to add TRO and TRRO issues to the generic docket. The parties engaged in these negotiations have agreed that all disputed issues must be identified and filed with the PSCs by June 29, 2005, and this deadline has been proposed to each state commission.

In March of 2005, BellSouth provided each CLEC with its proposed contract language to implement the TRRO and TRO, and BellSouth has been negotiating that language with CLECs, often quite successfully. Other CLECs have not negotiated such language. Despite these negotiations, it is clear that disputed issues remain, and the parties will require third party assistance to resolve them. The issues that BellSouth and the representatives of the CLEC community have identified in the generic proceedings are fairly extensive and comprehensive, and BellSouth believes that those issues will address most, if not all, of the open issues that BellSouth has with the various CLECs with which it is negotiating. However, if there are other issues related to the TRO or TRRO that any CLEC would like the state commissions to resolve, or if an individual CLEC simply wishes to be heard specifically on any issue that is already pending in the generic proceedings, the CLEC should take note of the proposed deadlines for raising issues resulting from the referenced FCC and court orders. It is BellSouth's

position that all TRO and TRRO issues must be addressed in the generic proceedings in order to comply with the FCC's mandate that Interconnection Agreements be amended promptly and without delay to implement the TRRO requirements.

Attached to this letter are (1) the current issues list in the generic dockets for the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee; and (2) the proposed generic docket procedural schedule for each of the nine states.

Again, BellSouth provides this notice simply to ensure that all CLECs have notice of these pending proceedings and have an opportunity to raise additional issues by the June 29, 2005 proposed deadline.

Should you have any questions concerning this notice, please contact your BellSouth contract negotiator.

Sincerely,

ORIGINAL SIGNED BY PAM TIPTON FOR JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services

Attachment

**CHANGE OF LAW GENERIC DOCKET
ISSUES MATRIX**

NO.	ISSUE DESCRIPTION
1	TRRO / FINAL RULES: The Section 252 process requires negotiations and to the extent parties may not be able to negotiate resolution of particular issues arising out of the Final Rules/TRRO or to the extent that new issues related to the Final Rules/TRRO arise, issues related to those matters will be added to this list.
2	TRRO / FINAL RULES: What is the appropriate language to implement the FCC's transition plan for (1) switching, (2) high capacity loops and (3) dedicated transport as detailed in the FCC's Triennial Review Remand Order ("TRRO"), issued February 4, 2005?
3	TRRO / FINAL RULES: a) How should existing ICAs be modified to address BellSouth's obligation to provide network elements that the FCC has found are no longer Section 251(c)(3) obligations? b) What is the appropriate way to implement in new agreements pending in arbitration any modifications to BellSouth's obligations to provide network elements that the FCC has found are no longer Section 251(c)(3) obligations?
4	TRRO / FINAL RULES: What is the appropriate language to implement BellSouth's obligation to provide Section 251 unbundled access to high capacity loops and dedicated transport?
5	TRRO / FINAL RULES: a) Does the Commission have the authority to determine whether or not BellSouth's application of the FCC's Section 251 non-impairment criteria for high-capacity loops and transport is appropriate? b) What procedures should be used to identify those wire centers that satisfy the FCC's Section 251 non-impairment criteria for high-capacity loops and transport? c) What language should be included in agreements to reflect the procedures identified in (b)?
6	TRRO / FINAL RULES: Are HDSL-capable copper loops the equivalent of DS1 loops for the purpose of evaluating impairment?
7	TRRO / FINAL RULES: Once a determination is made that CLECs are not impaired without access to high capacity loops or dedicated transport pursuant to the FCC's rules, can changed circumstances reverse that conclusion, and if so, what process should be included in Interconnection Agreements to implement such changes?

**CHANGE OF LAW GENERIC DOCKET
ISSUES MATRIX**

NO.	ISSUE DESCRIPTION
8	<p>TRRO / FINAL RULES:</p> <p>(a) Does the Commission have the authority to require BellSouth to include in its interconnection agreements entered into pursuant to Section 252, network elements under either state law, or pursuant to Section 271 or any other federal law other than Section 251?</p> <p>(b) If the answer to part (a) is affirmative in any respect, does the Commission have the authority to establish rates for such elements?</p> <p>(c) If the answer to part (a) or (b) is affirmative in any respect, (i) what language, if any, should be included in the ICA with regard to the rates for such elements, and (ii) what language, if any, should be included in the ICA with regard to the terms and conditions for such elements?</p>
9	<p>TRRO / FINAL RULES: What conditions, if any, should be imposed on moving, adding, or changing orders to a CLEC's respective embedded bases of switching, high-capacity loops and dedicated transport, and what is the appropriate language to implement such conditions, if any?</p>
10	<p>TRRO/FINAL RULES: What rates, terms, and conditions should govern the transition of existing network elements that BellSouth is no longer obligated to provide as Section 251 UNEs to non-Section 251 network elements and other services?</p>
11	<p>TRRO / FINAL RULES: What rates, terms and conditions, if any, should apply to UNEs that are not converted on or before March 11, 2006, and what impact, if any, should the conduct of the parties have upon the determination of the applicable rates, terms and conditions that apply in such circumstances?</p>
12	<p>TRRO / FINAL RULES: Should identifiable orders properly placed that should have been provisioned before March 11, 2005, but were not provisioned due to BellSouth errors in order processing or provisioning, be included in the "embedded base?"</p>
13	<p>TRRO / FINAL RULES: Should network elements de-listed under section 251(c) (3) be removed from the SQM/PMAP/SEEM?</p>
14	<p>TRO - COMMINGLING: What is the scope of commingling allowed under the FCC's rules and orders and what language should be included in Interconnection Agreements to implement commingling (including rates)?</p>
15	<p>TRO - CONVERSIONS: Is BellSouth required to provide conversion of special access circuits to UNE pricing, and, if so, at what rates, terms and conditions and during what timeframe should such new requests for such conversions be effectuated?</p>
16	<p>TRO - CONVERSIONS: What are the appropriate rates, terms, conditions and effective dates, if any, for conversion requests that were pending on the effective date of the TRO?</p>
17	<p>TRO - LINE SHARING: Is BellSouth obligated pursuant to the Telecommunications Act of 1996 and FCC Orders to provide line sharing to new CLEC customers after October 1, 2004?</p>

**CHANGE OF LAW GENERIC DOCKET
ISSUES MATRIX**

NO.	ISSUE DESCRIPTION
18	TRO – LINE SHARING – TRANSITION: If the answer to foregoing issue is negative, what is the appropriate language for transitioning off a CLEC's existing line sharing arrangements?
19	TRO – LINE SPLITTING: What is the appropriate ICA language to implement BellSouth's obligations with regard to line splitting?
20	TRO – SUB-LOOP CONCENTRATION: What is the appropriate ICA language, if any, to address sub loop feeder or sub loop concentration?
21	TRO – PACKET SWITCHING: What is the appropriate ICA language, if any, to address packet switching?
22	TRO – CALL-RELATED DATABASES: What is the appropriate ICA language, if any, to address access to call related databases?
23	TRO – GREENFIELD AREAS: a) What is the appropriate definition of minimum point of entry ("MPOE")? b) What is the appropriate language to implement BellSouth's obligation, if any, to offer unbundled access to newly-deployed or 'greenfield' fiber loops, including fiber loops deployed to the minimum point of entry ("MPOE") of a multiple dwelling unit that is predominantly residential, and what, if any, impact does the ownership of the inside wiring from the MPOE to each end user have on this obligation?
24	TRO – HYBRID LOOPS: What is the appropriate ICA language to implement BellSouth's obligation to provide unbundled access to hybrid loops?
25	TRO – END USER PREMISES: Under the FCC's definition of a loop found in 47 C.F.R. §51.319(a), is a mobile switching center or cell site an "end user customer's premises"?
26	TRO – ROUTINE NETWORK MODIFICATION: What is the appropriate ICA language to implement BellSouth's obligation to provide routine network modifications?
27	TRO – ROUTINE NETWORK MODIFICATION: What is the appropriate process for establishing a rate, if any, to allow for the cost of a routine network modification that is not already recovered in Commission-approved recurring or non-recurring rates? What is the appropriate language, if any, to incorporate into the ICAs?
28	TRO – FIBER TO THE HOME: What is the appropriate language, if any, to address access to overbuild deployments of fiber to the home and fiber to the curb facilities?
29	TRO – EELS AUDITS: What is the appropriate ICA language to implement BellSouth's EEL audit rights, if any, under the TRO?
30	252(i): What is the appropriate language to implement the FCC's "entire agreement" rule under Section 252(i)?
31	ISP Remand Core Forbearance Order: What language should be used to incorporate the FCC's <i>ISP Remand Core Forbearance Order</i> into interconnection agreements?

**CHANGE OF LAW GENERIC DOCKET
ISSUES MATRIX**

NO.	ISSUE DESCRIPTION
32	General Issue: How should the determinations made in this proceeding be incorporated into existing § 252 interconnection agreements?

Week beginning	Week	State 1 (GA)	State 2 (TN)	State 3 (NC)	State 4 (LA)	State 5 (AL)	State 6 (KY)	State 7 (SC)	State 8 (MS)	State 9 (FL)
27-Jun	1	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)	Issues List (Wed)
4-Jul	2									
11-Jul	3									
18-Jul	4	Direct (Tue)								
25-Jul	5		Direct (Tue)							
1-Aug	6			Direct (Mon)						
8-Aug	7	Rebuttal (Tue)								
15-Aug	8		Rebuttal (Tue)		Direct (Tue)	Direct (Tue)				
22-Aug	9								Direct (Tue)	Direct (Tue)
29-Aug	10	Hearing (M-Th)		Rebuttal (Mon)						
5-Sep	11				Rebuttal (Thurs)	Rebuttal (Thurs)				
12-Sep	12		Hearing (M-Th)							
19-Sep	13			Hearing (M-Th)						
26-Sep	14				Hearing (M-W)	Hearing (Th-F)		Rebuttal (Thurs)	Rebuttal (Thurs)	
3-Oct	15									
10-Oct	16									
17-Oct	17	Briefs (Fri)					Hearing (M-W)	Hearing (M-T)		
24-Oct	18		Briefs (Fri)	Briefs (Fri)						
31-Oct	19				Briefs (Fri)	Briefs (Fri)			Hearing (W-F)	
7-Nov	20						Briefs (Fri)			
14-Nov	21							Briefs (Fri)		
21-Nov	22								Briefs (Wed)	Briefs (Fri)
28-Nov	23									
5-Dec	24									
12-Dec	25									
19-Dec	26									
26-Dec	27									
2-Jan	28									
9-Jan	29									
16-Jan	30									
23-Jan	31									
30-Jan	32									
6-Feb	33									
13-Feb	34									
20-Feb	35									
27-Feb	36									
Decision date	30-Jan									
Notes										
1. Yellow shading indicates Holiday week.										
2. We are aware that the NCUC requires the filing of a proposed order and estimated cross-examination times (the latter is due 9/14).										

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 04-00381
TRA's Data Requests
September 23, 2005
Item No.1(b)

**ATTACHMENT
TO REQUEST NO. 1(b)**



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91084043**

Date: March 23, 2004

To: All Competitive Local Exchange Carriers (CLEC)

Subject: CLECs (Product/Service) - Commercial Agreement for BellSouth DS0 Wholesale Local Voice Platform Service

On March 2, 2004, the United States Court of Appeals for the District of Columbia ("Court") issued its opinion (Order) in the appeal of the Federal Communication Commission's (FCC) Triennial Review Order (TRO). The Court vacated and/or remanded significant portions of the TRO. Specifically, the Court vacated the FCC's rules associated with, among other items, mass-market switching, thereby eliminating BellSouth's obligation to provide unbundled switching and, therefore, Unbundled Network Elements-Platform (UNE-P) at TELRIC rates. The Court's Order will become effective May 1, 2004, unless the Court grants a rehearing or issues a stay of the Order.

In light of the Court's Order, BellSouth is prepared to offer switching and DS0 loop/switching combinations (including what is currently known as UNE-P) at commercially reasonable and competitive rates. BellSouth will offer switching via a DS0 Wholesale Local Voice Platform Services commercial agreement. Consistent with the direction provided by FCC Chairman Michael Powell, BellSouth invites your company to enter into good faith negotiations of a market-based commercial agreement aimed at benefiting the end user, establishing stability in the industry and allowing real competition to continue throughout the BellSouth region. Entering into such an agreement will effect an efficient transition from switching under your existing Interconnection Agreement to switching offered on a commercial basis.

Highlights of this offer are as follows:

Availability:

This offer is available until May 1, 2004

Term:

Agreements executed before May 1, 2004, will be effective through December 31, 2007

Rates:

The Agreement establishes a rate schedule for the DS0 Wholesale Local Voice Platform Services and standalone DS0 switch ports for the entire contract period.

Mass Market (less than 4 DS0 lines per end user):

- \$7 above existing state-ordered TELRIC UNE-P recurring rates*
- Discounts in 2004 result in a zero net increase above TELRIC*
- Transitional discounts in January 2005 through December 2006

* Rates ordered prior to June 24, 2003 in Georgia

Mass Market (cont.):

- Standalone DS0 switch ports at \$7 increase over existing state-ordered TELRIC recurring rates* with no transitional discounts

Enterprise Market (four or more DS0 lines or where a DS1 is serving an end user):

- Provides a \$10 increase over current DS0 state-ordered TELRIC UNE-P recurring rates* and applies to both DS0 Wholesale Local Voice Platform Services and standalone DS0 ports

Significant General Terms:

- Customer may continue to purchase standalone Loops or Resale Services under a BellSouth interconnection agreement and/or tariff.
- Guaranteed service metrics are offered through a service level commitment and are subject to payments by BellSouth to the customer for non-performance
- Prices, excluding discounts, for DS0 Wholesale Local Voice Platform Services will remain constant over the term of the Agreement.
- Damages will apply for non-compliance with the terms of the Agreement.

This offer is available only until May 1, 2004. Again, BellSouth invites you to enter into good faith negotiations of a commercial agreement as soon as possible in order to complete these negotiations by May 1.

To begin the negotiation process or obtain additional information, please contact Valerie Cottingham at 205-321-4970.

Sincerely,

Original signed by Jerry Hendrix

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services

* Rates ordered prior to June 24, 2003 in Georgia



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91084063**

Date: April 22, 2004
To: All Competitive Local Exchange Carriers (CLEC)
Subject: CLECs – (Product/Service) – Commercial Offering for BellSouth Unbundled Network Element (UNE) Transport Transition

Upon the DC Circuit Court's effective vacatur of portions of the FCC's Triennial Review Order, BellSouth's obligation to provide dedicated transport and high capacity loops as an unbundled network element pursuant to Section 251 of the Telecommunications Act of 1996 will be eliminated. As such, and due to general regulatory uncertainty, BellSouth is preparing to offer its dedicated transport and high capacity loops products solely via its access tariffs.

Until June 15, 2004, BellSouth is offering a two-party transition plan to effect an efficient and coordinated transition from UNE transport and high capacity loops under your company's existing Interconnection Agreement to transport offered via BellSouth's tariffs.

This offer is available only until June 15, 2004. BellSouth invites your company to enter into good faith negotiations of this plan as soon as possible in order to complete these negotiations by June 15, 2004.

To begin the negotiation process or obtain additional information, please contact Shemega Goodman at 404.927.7571.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91084127**

Date: June 15, 2004

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Product/Service) – Commercial Agreement for BellSouth DS0 Wholesale Local Voice Platform Services

This is to inform CLEC customers that BellSouth intends to continue to offer its Commercial Agreement for BellSouth's DS0 Wholesale Local Voice Platform Services, as previously outlined in **Carrier Notification Letter SN91084043**, subject to BellSouth's right to terminate this offer at any time upon notice.

BellSouth's Commercial Agreement has an approximate three-year term, through December 31, 2007. It allows CLECs to purchase DS0 Wholesale Local Voice Platform Services from BellSouth and provides for a zero net rate increase above existing equivalent Unbundled Network Element (UNE) rates in 2004. BellSouth invites you to contact your negotiator to learn more about BellSouth's Commercial Agreement, which is aimed at benefiting end users, establishing stability in the industry, and allowing real competition in BellSouth's region.

To obtain more information about this agreement, please contact your BellSouth contract negotiator.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91085032**

Date: February 8, 2005
To: Competitive Local Exchange Carriers (CLEC)
Subject: CLECs – (Product/Service) – Commercial Agreement for BellSouth DS0 Wholesale Local Voice Platform Services

On February 4, 2005, the Federal Communications Commission (FCC) released its Order on Remand ("Order"), which, among other things, relieved Incumbent Local Exchange Carriers ("ILEC") of their obligation to provide unbundled access to mass market switching and Unbundled Network Element-Platform ("UNE-P") services, on a nationwide basis, pursuant to Section 251 of the Act. The Order establishes a twelve-month transition period commencing March 11, 2005, during which CLECs must transition their embedded base of mass market switching and UNE-P lines to alternative arrangements. The Order further precludes CLECs from adding new UNE-P lines starting March 11, 2005.

As a result of these ordered changes, BellSouth would like to inform CLEC customers that through March 10, 2005, the day before the Order becomes effective, BellSouth will continue to offer its current DS0 Wholesale Local Voice Platform Services Commercial Agreement ("DS0 Agreement") with transitional discounts off of BellSouth's current market rate for mass market platform services. As of March 11, 2005, although BellSouth will continue to offer commercial agreements for DS0 switching and platform services, the pricing set forth in the current DS0 Agreement will no longer be available.

BellSouth encourages CLECs to contact their negotiator to find out more about its DS0 Agreement while the transitional discounts remain available.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91085061**

Date: March 7, 2005

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Interconnection/Contractual and Product/Service) – Triennial Review Remand Order (TRRO) - Unbundling Rules

On February 4, 2005, the Federal Communications Commission (FCC) released its permanent unbundling rules in the Triennial Review Remand Order (TRRO).

On February 11, 2005, BellSouth released Carrier Notification letter **SN91085039**, in which BellSouth set forth its understanding of the TRRO, particularly as it affected BellSouth's obligations to provide a number of former Unbundled Network Elements ("UNEs") after March 11, 2005. Specifically, BellSouth acknowledged that there would be a transition period for the embedded base of these former UNEs, but concluded that the FCC had intended to stop all "new adds" of these former UNEs effective March 11, 2005.

BellSouth posted this Carrier Notification letter on February 11, 2005, in order to provide the CLECs with as much lead time as possible in order to allow the CLECs to take whatever steps were necessary to adjust to the new situation created by the TRRO. Unfortunately, the step chosen by a number of CLECs in response to the clear language of the FCC dealing with "new adds" has been to ask various state commissions to order BellSouth to continue to accept such "new adds." Indeed, this approach has, to date, been successful in at least one jurisdiction, Georgia.

Furthermore, notwithstanding the fact that BellSouth's Carrier Notification SN91085039 was posted on February 11, 2005, various CLECs continue, as recently as March 3, 2005, to file requests with state commissions that have not addressed this question. These requests remain pending before state commissions and it is not clear, because of the delay in filing of these requests by the CLECs, that all state commissions will have a full and adequate opportunity to consider the important issue of whether the FCC actually meant what it said in its order when it indicated that there would be no "new adds." Indeed, at the present time there are at least two commissions in BellSouth's region that have scheduled consideration of the CLECs' requests at a date beyond March 11, 2005, the effective date of the TRRO, and the date that BellSouth had established to prevent unlawful "new adds."

Because of these events, BellSouth herewith revises the implementation date contained in Carrier Notification SN91085039 in the following respects. BellSouth will continue to receive, and will not reject, CLEC orders for "new adds" as they relate to the former UNEs as identified by the FCC for a short period of time. BellSouth will continue to accept CLEC orders for these "new adds" until the earlier of (1) an order from an appropriate body, either a commission or a court, allowing BellSouth to reject these orders; or (2) April 17, 2005. By doing this, BellSouth intends to allow those commissions who have not had the opportunity to fully and carefully consider the requests of the CLECs and the responses of BellSouth, to do so in a measured way, rather than via various "emergency" proceedings created by the dilatory tactics of a number of CLECs.

By extending the time during which BellSouth will accept these orders, BellSouth does not abandon its legal position that the clear words of the FCC mean exactly what they say. BellSouth will continue to pursue that position before the state commissions, and to the extent that a commission has ruled adversely to BellSouth's position, in the courts. Specifically, BellSouth will be asking the appropriate courts to stay any such adverse order we receive.

In addition, BellSouth hereby puts the CLECs on notice that it intends to pursue the various CLECs who place orders for "new adds" after March 10, 2005 to the greatest extent of the law, in an effort to recover the revenue that BellSouth loses as a result of the placement of these unlawful orders. Should any state commission be inclined to ignore the plain language of the FCC's TRRO, and to order BellSouth to continue accepting "new adds" until the issue is fully resolved, BellSouth will ask that commission to require CLECs to compensate BellSouth, in the event BellSouth ultimately prevails in its legal claim, for any former UNE added after March 10, 2005, in an amount equal to the difference in the rate paid by the CLEC and the appropriate rate BellSouth should have collected (either commercial or resale, depending on which service option the CLEC ultimately elects).

As noted in Carrier Notification SN91085039, CLECs will continue to have several options involving switching, loops and transport available to serve their new customers. To this end, with regard to the combinations of switching and loops that constituted UNE-Platform (UNE-P), BellSouth is offering CLECs these options:

- Short Term (3-6 month) Commercial Agreement to provide a bridge between the effective date of the Order and the negotiation of a longer term commercial agreement,
- Long Term Commercial Agreement (3 years, effective January 1, 2005, with transitional discounts available under those agreements executed by March 10, 2005)

In addition, most CLECs, if not all, already have the option of ordering these former UNEs, and particularly the combination of loops and switching, as resale, pursuant to existing interconnection agreements. With regard to the former high capacity loops and transport UNEs, BellSouth has two options for CLECs to consider. Specifically, CLECs may either elect to order resale of BellSouth's Private Line Services or alternatively, may request Special Access service.

Finally, as stated in Carrier Notification letter SN91085032 concerning the availability of a long term commercial agreement, through March 10, 2005, BellSouth will continue to offer its current DS0 Wholesale Local Voice Platform Services Commercial Agreement ("DS0 Agreement") with transitional discounts off of BellSouth's market rate for mass market platform services. Beginning March 11, 2005, BellSouth will offer a DS0 Agreement, but the existing transitional discounts will not be available.

To obtain more information about this notification, please contact your BellSouth contract negotiator.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services



BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91085039**

Date: March 10, 2005

To: Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Product/Service) – **REVISED** - Triennial Review Remand Order (TRRO) - Unbundling Rules (Originally posted February 11, 2005 and Revised February 25, 2005) **BellSouth has revised the implementation date contained in this letter. Please refer to Carrier Notification letter SN91085061, posted March 7, 2005, for additional details.**

On February 4, 2005, the Federal Communications Commission (FCC) released its permanent unbundling rules in the Triennial Review Remand Order (TRRO).

The TRRO has identified a number of former unbundled network elements ("UNEs") that will no longer be available as of March 11, 2005, except as provided in the TRRO. These former UNEs include all switching¹, as well as certain high capacity loops in specified central offices², and dedicated transport between a number of central offices having certain characteristics,³ as well as dark fiber⁴ and entrance facilities⁵.

The FCC, recognizing that it removed significant unbundling obligations formerly placed on incumbent local exchange carriers (ILEC), adopted transition plans to move the embedded base of these former UNEs to alternative serving arrangements.⁶ The FCC provided that the transition period for each of these former UNEs (loops, transport and switching), would commence on March 11, 2005.⁷ The FCC made provisions to include these transition plans in existing interconnection agreements through the appropriate change of law provisions. It also provided that rates for these former UNEs during the transition period would be trued up back to the effective date of the TRRO to reflect the increases in the prices of those former UNEs that were approved by the FCC in the TRRO.

The FCC took a different direction with regard to the issue of "new adds" involving these former UNEs. With regard to each of the former UNEs the FCC identified, the FCC provided that no "new adds" would be allowed as of March 11, 2005, the effective date of the TRRO. For instance, with regard to switching, the FCC said, "This transition period shall apply only to the embedded customer base, and does not permit competitive LECs to add new customers using unbundled access to local circuit switching."⁸ The FCC also said "This transition period shall apply only to the embedded customer

¹ TRRO, ¶199

² TRRO, ¶¶174 (DS3 loops), 178 (DS1 loops)

³ TRRO, ¶¶126 (DS1 transport), 129 (DS3 transport),

⁴ TRRO, ¶¶133 (dark fiber transport), 182 (dark fiber loops)

⁵ TRRO, ¶141

⁶ TRRO, ¶¶142 (transport), 195 (loops), 226 (switching)

⁷ TRRO, ¶¶143 (transport), 196 (loops) 227 (switching)

⁸ TRRO, ¶199

base, and does not permit competitive LECs to add new UNE-P arrangements using unbundled access to local circuit switching pursuant to section 251 (c)(3) except as otherwise specified in this Order." (footnote omitted)⁹

The FCC clearly intended the provisions of the TRRO related to "new adds" to be self-effectuating. First, the FCC specifically stated that "Given the need for prompt action, the requirements set forth herein shall take effect on March 11, 2005.. .."¹⁰ Further, the FCC specifically stated that its order would not "...supersede any alternative arrangements that carriers voluntarily have negotiated on a commercial basis...",¹¹ but made no such finding regarding existing interconnection agreements. Consequently, in order to have any meaning, the TRRO's provisions regarding "new adds" must be effective March 11, 2005, without the necessity of formal amendment to any existing interconnection agreements. Therefore, while BellSouth will not breach its interconnection agreements, nor act unilaterally to modify its agreements, the FCC's actions clearly constitute a generic self-effectuating change for all interconnection agreements with regard to "new adds" for these former UNEs.

Thus, pursuant to the express terms of the TRRO, effective March 11, 2005, for "new adds," BellSouth is no longer required to provide unbundled local switching at Total Element Long Run Incremental Cost ("TELRIC") rates or unbundled network platform ("UNE-P") and as of that date, BellSouth will no longer accept orders that treat those items as UNEs.

Further, effective March 11, 2005, BellSouth is no longer required to provide high capacity UNE loops, including copper loops capable of providing High-bit Rate Digital Subscriber Line (HDSL) services in certain central offices or to provide UNE transport between certain central offices. As of that date, BellSouth will no longer accept orders that treat these items as UNEs, except where such orders are certified pursuant to paragraph 234 of the TRRO. In addition, as of March 11, 2005 BellSouth is no longer required to provide new UNE dark fiber loops or UNE entrance facilities under any circumstances and we will not accept orders for these former UNEs.

Prior to the effective date of the TRRO, BellSouth will provide comprehensive information to CLECs regarding those central offices where UNE DS1 and DS3 loops are no longer available, and the routes between central offices where UNE DS1, DS3 and dark fiber transport are no longer available.

CLECs will continue to have several options involving switching, loops and transport available to serve their new customers. To this end, with regard to the combinations of switching and loops that constituted UNE-P, BellSouth is offering CLECs these options:

- Short Term (6 month) Commercial Agreement to provide a bridge between the effective date of the Order and the negotiation of a longer term commercial agreement,
- Long Term Commercial Agreement (3 years, effective January 1, 2005, with transitional discounts available under those agreements executed by March 10, 2005)

In addition, most CLECs, if not all, already have the option of ordering these former UNEs, and particularly the combination of loops and switching, as resale, pursuant to existing interconnection agreements.

To be clear, in the event one of the above options is not selected and a CLEC submits a request for new UNE-P on March 11, 2005 or after, the order will be returned to the CLEC for clarification and resubmission under one of the available options set forth above. CLECs that have already signed a Commercial Agreement may continue to request new service pursuant to their Commercial Agreement.

⁹ TRRO, ¶227

¹⁰ TRRO ¶235

¹¹ TRRO ¶199 Also see ¶ 198

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With regard to the former high capacity loop and transport UNEs, including dark fiber and entrance facilities, that BellSouth is no longer obligated to offer, BellSouth has two options for CLECs to consider. Specifically, CLECs may either elect to order resale of BellSouth's Private Line Services or alternatively, may request Special Access service in lieu of the former TELRIC-priced UNEs. Any orders submitted for new unbundled high capacity loops and unbundled dedicated interoffice transport in those non-impaired areas after March 11, 2005, without the required certifications, will be returned to the CLEC for clarification and resubmission under one of the above options.

To obtain more information about this notification, please contact your BellSouth contract negotiator.

Sincerely,

ORIGINAL SIGNED BY JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 04-00381
TRA's Data Requests
September 23, 2005
Item No. 3

**ATTACHMENT
TO REQUEST NO. 3**

BellSouth D.C., Inc.
Legal Department
Suite 900
1133 21st Street, N W
Washington, D.C. 20036-3351

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel-D.C.

202 463 4113
Fax 202 463 4195

December 7, 2004

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313;

*Review of the Section 251 Unbundling Obligations of Incumbent Local
Exchange Carriers*, CC Docket No. 01-338;

Dear Ms. Dortch:

At the request of the Policy Division Staff, BellSouth Telecommunications, Inc. ("BellSouth") is submitting the enclosed business line count data, which is based upon its ARMIS 43.08 report and which breaks down by wire center the total number of business access lines and fiber based collocators in that wire center as of December 2003.

The number of business access lines reflected in this filing includes retail business lines, pay phone lines, business resold lines, unbundled network element platforms ("UNE-P") serving business customers, as well as all unbundled loops. These line counts do not reflect the total number of business lines in each wire center, since the lines served by facilities-based competitors are not included.

In responding to this request, BellSouth discovered two problems with the data that it presented in its initial comments which is similar to that requested by the Policy Division Staff.¹ Specifically, BellSouth inadvertently omitted several wire centers from its data and included incorrect unbundled loop counts.

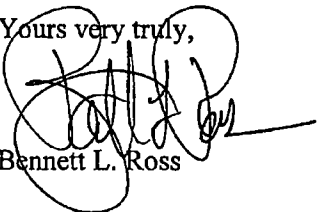
¹ See, e.g., Affidavit of Shelly W. Padgett, Exhibits 1 and 3.

Ms. Marlene H. Dortch
December 7, 2004
Page -2-

These errors were not material and have been corrected in the business line count data that is filed herewith. The corrected data shows 1,583 central offices, as opposed to 1,574 central offices previously reported, and 81 central offices which 20,000 or more business lines, as opposed to the 80 previously reported. BellSouth will be filing revised exhibits, as well as amended ex parte letters to correct the record. BellSouth regrets these errors and apologizes for any inconvenience.

Thank you for your attention to this matter.

Yours very truly,

A handwritten signature in black ink, appearing to read "B. Ross", is written over the typed name "Bennett L. Ross". The signature is stylized with a large loop and a horizontal stroke extending to the right.

Bennett L. Ross

BLR:kjw

Enclosure

cc:	Jeffrey Carlisle	Ian Dillner
	Michelle Carey	Russell Hanser
	Thomas Navin	Pamela Arluk
	Jeremy Miller	Marcus Maher
	Christopher Libertelli	Matthew Brill
	Jessica Rosenworcel	Daniel Gonzalez
	Scott Bergmann	

#562035



Federal Communications Commission
Washington, D.C. 20554

February 4, 2005

Via Facsimile and First Class Mail

Herschel L. Abbott, Jr.
Vice President - Governmental Affairs
BellSouth
1133 21st Street, NW, Suite 900
Washington DC 20036

**Re: Unbundled Access to Network Elements, WC Docket No. 04-313; Review of Section 251
Unbundling Obligations for Incumbent Local Exchange Carriers, CC Docket No. 01-338**

Dear Mr. Abbott:

On February 4, 2005, the Commission released its *Triennial Review Remand Order*, adopting rules governing the unbundling obligations of incumbent LECs regarding, among other things, dedicated transport and high-capacity loops.¹ In crafting impairment thresholds for these elements that relied on readily ascertainable, quantitative criteria, the Commission sought to facilitate prompt implementation of its revised rules, and to minimize disputes regarding the scope of an incumbent LEC's unbundling obligations in any particular case. The Bureau is mindful of the need for certainty within the industry regarding the scope of unbundling obligations. Such certainty depends on the timely incorporation of the *Triennial Review Remand Order's* fact-dependent rules into revised interconnection agreements. To this end, we ask that you provide the Bureau a list identifying by Common Language Location Identifier (CLLI) code² which wire centers in your company's operating areas satisfy the Tier 1, Tier 2, and Tier 3 criteria for dedicated transport, and identifying by CLLI code the wire centers that satisfy the nonimpairment thresholds for DS1 and DS3 loops.³ We ask that you submit this information into the above-referenced dockets by February 18, 2005.

The Bureau believes that this information will expedite the implementation of the Commission's rules implementing the Act. I thank you in advance for your prompt reply to this request.

Sincerely,

/s/

Jeffrey J. Carlisle
Chief, Wireline Competition Bureau

¹ *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, Order on Remand (*Triennial Review Remand Order*)

² The CLLI code is an eight character code that identifies a particular wire center.

³ *Id.* at para. 120 (defining Tier 1 wire centers); *id.* at para. 126 (defining Tier 2 wire centers), *id.* at para. 131 (defining Tier 3 wire centers); *id.* at para. 185 (defining wire center nonimpairment threshold for DS3 loops), *id.* at para. 189 (defining wire center nonimpairment threshold for DS1 loops); see also *id.*, App. B, 47 C.F.R. §§ 51.319(a)(4)(i), (a)(5)(i), (c)(3).

BellSouth D.C., Inc.
Legal Department
Suite 900
1133 21st Street, N.W.
Washington, D C. 20036-3351

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel-D C

202 463 4113
Fax 202 463 4195

February 18, 2005

Jeffrey J. Carlisle
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313;

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Mr. Carlisle:

Pursuant to your letter to Mr. Herschel Abbott, dated February 4, 2005, enclosed please find a list by Common Language Location Identifier ("CLLI") code of those BellSouth wire centers that satisfy the Tier 1, Tier 2, and Tier 3 criteria for dedicated transport and dark fiber as well as the CLLI code for the BellSouth wire centers that satisfy the nonimpairment thresholds for DS-1 and DS-3 loops.

In compiling this list, BellSouth applied the Commission's definition of a "business line" as set forth in Section 51.5 of the revised rules adopted in the Commission's *Triennial Review Remand Order*.¹ In particular, BellSouth counted all ISDN and other switched digital access lines in each wire center on a per 64 kbps-equivalent basis as required by the rule. In addition, in determining the number of fiber-based collocators in each particular wire center, BellSouth reviewed its records to verify the existence of an "active electrical power supply" to the particular collocation arrangement as required by Section 51.5. When the Commission requested that BellSouth submit wire center data in December 2004, the Commission did not specify any particular methodology, and thus BellSouth did not use the 64 kbps-equivalent approach or attempt to verify an active electrical power supply.

¹ *Unbundled Access to Network Elements, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, Order on Remand (Feb. 4, 2005) ("*Triennial Review Remand Order*").

Jeffrey J. Carlisle
February 18, 2005
Page -2-

BellSouth shares the Commission's desire, as indicated in your letter, "to facilitate prompt implementation of its revised rules, and to minimize disputes regarding the scope of incumbent LEC's unbundling obligations in any particular case." Although we disagree with certain aspects of the Commission's *Triennial Review Remand Order*, "certainty" regarding the scope of unbundling obligations is important to the entire industry, as your letter notes. In that regard, BellSouth will be posting the enclosed list on its interconnection website (<http://interconnection.bellsouth.com/notifications/carrier/index.html>) so that all requesting carriers will be aware of the particular wire centers in which the nonimpairment thresholds have been met and in or between which new high-capacity loops and transport will no longer be available on an unbundled basis as of March 11, 2005. With dissemination of this information, a carrier that subsequently requests new high-capacity loops and transport on an unbundled basis in or between these affected wire centers will be unable to self-certify based upon a "reasonably diligent inquiry" that its request is consistent with the Commission's unbundling requirements, as required by the *Triennial Review Remand Order*.²

To the extent any party is concerned about the methodology BellSouth has employed or the wire centers identified on the enclosed list in which the nonimpairment thresholds have been met, it should bring that concern to the Commission's attention. As the *Triennial Review Remand Order* makes clear, it is for the Commission to determine where "no section 251(c) unbundling requirement exists,"³ and thus any dispute about whether an incumbent has been relieved of its section 251(c) unbundling obligations in a particular wire center must be resolved by the Commission.

The Commission's *Triennial Review Remand Order* cannot and should not be read to suggest that the state public service commissions have any role in establishing the wire centers in which the Commission's nonimpairment thresholds are currently met.⁴ To do otherwise effectively would result in the delegation of impairment decisions with regard to high-capacity loops and transport to 50 state public service commissions in clear violation of *USTA II*.⁵ Just as it was unlawful to delegate to the state commissions the authority to determine whether the Commission's "competitive triggers" had been met for purposes of determining where switching and high-capacity loops and transport should be unbundled under the *Triennial Review Order*, it would be equally unlawful to allow state public service commissions to determine where the Commission's new nonimpairment thresholds for high-capacity loops and transport are currently

² *Triennial Review Remand Order*, ¶ 234.

³ *Id.* ¶ 142

⁴ The Commission directed parties to negotiate pursuant to the section 252 process the "appropriate transition mechanisms" for those high-capacity facilities "not currently subject to the nonimpairment thresholds" established in the *Triennial Review Remand Order* that subsequently "may meet those thresholds in the future." *Id.* ¶ 142, n.399. However, the Commission did not require the parties to negotiate, let alone for 50 state public service commissions to arbitrate, the wire centers in which the nonimpairment thresholds are currently met.

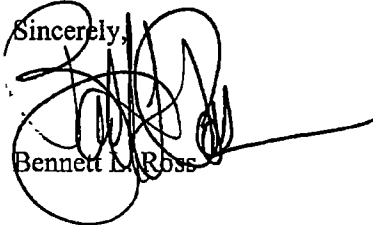
⁵ *United States Telecom Ass'n v. FCC*, 359 F.3d 554 (D.C. Cir. 2004) ("*USTA II*"), *cert. denied*, *NARUC v. United States Telecom. Ass'n*, 04-12, 04-15 & 04-18 (U.S. Oct. 12, 2004).

Jeffrey J. Carlisle
February 18, 2005
Page -3-

met under the *Triennial Review Remand Order*. The Telecommunications Act of 1996 requires a uniform methodology and application of the Commission's unbundling rules, which cannot occur if unbundling determinations are left to the state commissions.⁶

BellSouth believes that its determinations concerning the wire centers in which the Commission's nonimpairment thresholds for high-capacity loops, transport, and dark fiber are completely consistent with the Commission's revised rules. The same is true for BellSouth's approach to implementation of those rules as set forth above, which should minimize disputes and facilitate the certainty the industry requires. BellSouth will assume the Commission agrees unless the Commission advises otherwise.

Sincerely,



Bennett L. Ross

BLR:kjw

cc: Christopher Libertelli
Matthew Brill
Jessica Rosenworcel
Daniel Gonzalez
Scott Bergmann
Michelle Carey
Thomas Navin
Austin Schlick
John Stanley
Jeremy Marcus
Pamela Arluk

#572871

⁶ Although *USTA II* recognized certain situations when input from an outside party into an agency's decision making processes might be appropriate, none of those situations applies here. In particular, there is no need for the Commission to rely upon "factual information" or "advice and policy recommendations" from a state public service commission in determining where the Commission's nonimpairment thresholds have been satisfied. *USTA II*, 359 F.2d at 558. Indeed, the Commission's rationale for establishing such thresholds was because they were based upon data that are "objective and readily available," which obviates the need for any input from state public service commissions. *Triennial Review Remand Order* ¶ 161.

BellSouth D.C., Inc.
Legal Department
Suite 900
1133 21st Street, N.W.
Washington, D.C. 20036-3351

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel-D.C.

202 463 4113
Fax 202 463 4195

March 23, 2005

Jeffrey J. Carlisle
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313;

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Mr. Carlisle:

At your request, BellSouth filed with the Commission on February 18, 2005, a list by Common Language Location Identifier ("CLLI") code of those wire centers that satisfied the nonimpairment thresholds for high-capacity loops, transport and dark fiber as adopted by the Commission in its *Triennial Review Remand Order*.¹ Since this filing, BellSouth has provided similar information and supporting data to Competing Local Exchange Carriers ("CLECs") as well as responded to numerous questions from CLECs about the methodology BellSouth used to identify these wire centers.

In preparing these data and responses, BellSouth recently discovered an error in the mathematical formula that was used to count retail digital access lines on a per 64 kbps-equivalent basis, as required by the Commission's rules. This error impacted only retail business line counts and did not affect the quantity of UNE-loops, which were correctly stated on a per 64 kbps-equivalent basis. However, as a result of this error, retail business lines were overstated, and thus the wire centers meeting the Commission's nonimpairment thresholds were not correctly identified in BellSouth's February 18, 2005 filing.

¹ *Unbundled Access to Network Elements, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, Order on Remand (Feb 4, 2005) ("*Triennial Review Remand Order*").

Jeffrey J. Carlisle
March 23, 2005
Page -2-

BellSouth understands the necessity of correctly implementing the Commission's nonimpairment thresholds and recognizes that it is only entitled to unbundling relief in or between those wire centers where the Commission has determined CLECs are not impaired without unbundled access to high-capacity loops, transport, and dark fiber. Because of the importance of the Commission's unbundling determinations and because both the Commission and the industry must know with certainty where those wire centers are located, BellSouth has retained an independent third party to review the methodology BellSouth utilized in implementing the nonimpairment thresholds set forth in the *Triennial Review Remand Order* and to identify the specific wire centers where those thresholds have been met. Once this independent third-party review is complete, BellSouth will provide the Commission and the industry with the results.

This independent, third-party review should not delay implementation of the *Triennial Review Remand Order* in BellSouth's region. Before the Commission's unbundling rules took effect on March 11, 2005, state commissions in Alabama, Georgia, and Kentucky had ordered BellSouth to continue providing unbundled switching and high-capacity facilities until BellSouth's interconnection agreements have been amended. In order to allow its other state commissions to consider the issue, BellSouth advised CLECs and state regulators that it would not reject orders for unbundled switching and high-capacity loops, transport and dark fiber until the earlier of: (i) issuance of an order from an appropriate body, either a commission or a court, allowing BellSouth to reject these orders; or (ii) April 17, 2005. This independent, third-party review will be completed and the results disseminated before BellSouth rejects, or challenges through dispute resolution, any orders for new unbundled high-capacity loops, transport, and dark fiber pursuant to the *Triennial Review Remand Order*.

BellSouth sincerely regrets this error and apologizes for any inconvenience that it has caused. Please let me know if you have any questions or need additional information.

Yours very truly,


Bennett L. Ross

BLR:kjw

cc: Daniel Gonzalez
Matthew Brill
Jessica Rosenworcel
Scott Bergmann

Michelle Carey
Thomas Navin
Jeremy Marcus
Pamela Arluk

#577846

BellSouth D.C., Inc.
Legal Department
Suite 900
1133 21st Street, N.W.
Washington, D.C. 20036-3351

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel-D.C.

202 463 4113
Fax 202 463 4195

June 3, 2005

Mr. Thomas Navin
Chief - Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313;

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Dear Mr. Navin:

As I advised in my March 23, 2005, letter to Jeff Carlisle, the filing BellSouth made at the request of the Wireline Competition Bureau identifying the wire centers that met the Commission's nonimpairment thresholds was inaccurate. Since its initial filing, and consistent with BellSouth's March 23, 2005 letter, BellSouth retained an independent third party -- Deloitte & Touche USA LLP ("Deloitte") -- to review the application of the methodology BellSouth used to count business lines as defined by the Commission, including the methodology used to account for digital access lines on a per 64 kbps-equivalent basis. In addition, BellSouth conducted site visits to its central offices to confirm the presence of fiber-based collocators as defined by the Commission's rules.

In accordance with the data reviewed by Deloitte and the information obtained through BellSouth's central office site visits, enclosed please find the corrected list by Common Language Location Identifier ("CLLI") code of those BellSouth wire centers that satisfy the Tier 1, Tier 2, and Tier 3 criteria for dedicated transport and dark fiber as well as the CLLI code for the BellSouth wire centers that satisfy the nonimpairment thresholds for DS-1 and DS-3 loops. This information was provided to Competitive Local Exchange Carriers ("CLECs") by Carrier Notification dated April 15, 2005. BellSouth also has permitted requesting CLECs to review the Deloitte report and supporting data subject to the protective order in these proceedings.

Mr. Thomas Navin
June 3, 2005
Page -2-

As the corrected list reflects, for dedicated interoffice transport and dark fiber, there are 80 and 49 BellSouth wire centers that satisfy the Tier 1 and Tier 2 criteria, respectively. For DS1 and DS3 loops, BellSouth has been relieved of unbundling obligations in 11 and 28 wire centers, respectively. The 28 wire centers represent only 2% percent of BellSouth's 1,583 central offices and serve less than 18 percent of BellSouth's total retail and resold business lines.

BellSouth recognizes that the corrected number of wire centers satisfying the Commission's nonimpairment thresholds for DS-1 and DS-3 loops and transport differ from the wire center data BellSouth filed with the Commission in December 2004. However, when BellSouth submitted the data in December 2004 at the Commission's request, the Commission did not specify any particular methodology, nor did BellSouth have the benefit of the new unbundling rules, specifically the definitions of a "business line" and "fiber-based collocater." Consequently, in three important respects, the wire center data furnished in December 2004 did not accurately reflect the Commission's requirements for determining whether its nonimpairment thresholds have been satisfied.

First, the December 2004 filing did not include "all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled network elements," as the Commission rules require. In particular, BellSouth's December 2004 wire center filing did not capture DS-1 loops provisioned as part of a so-called Enhanced Extended Loop (EEL), nor were DS-3 loops included in the data. Both of these loop types are reflected in the business line counts used to identify the wire centers set forth in BellSouth's corrected filing.

Second, with the exception of Basic Rate and Primary Rate ISDN retail lines, the December 2004 wire center filing did not count retail or wholesale digital access lines on a per 64 kbps-equivalent basis, as the Commission rules require. For example, a DS1 loop was counted in the original filing as one line when it should be counted as 24 lines under the Commission's rules. The business line counts used to identify the wire centers set forth in BellSouth's corrected filing have been adjusted to reflect the 64 kbps-equivalent basis requirement.

Third, in compiling the December 2004 wire center filing, BellSouth did not make any effort to verify whether a particular collocation arrangement had an "active electrical power supply," as the Commission rules require. The fiber-based collocater counts used to identify the wire centers set forth in BellSouth's corrected filing reflect only those collocaters that are being billed for more than the minimum amount of electrical power and that BellSouth has verified by personal inspection as maintaining a fiber-based collocation arrangement.

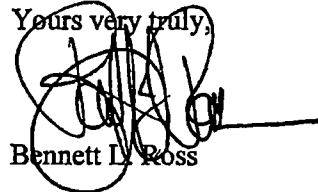
Application of the Commission's requirements for determining whether its nonimpairment thresholds have been satisfied is the explanation for the differences in the number of wire centers identified in BellSouth's corrected filing, and the wire center data BellSouth filed with the Commission in December 2004. Not surprisingly, including all UNE loops connected to a particular wire center and calculating each digital access line on a 64 kbps-equivalent basis caused the total number of business lines to increase, while verifying the

Mr. Thomas Navin
June 3, 2005
Page -3-

presence of a fiber-based collocater with an active electrical power supply caused the number of fiber-based collocaters to decrease.

Again, BellSouth apologizes for the error in its original list of wire centers, and please let me know if you have any questions or need additional information.

Yours very truly,

A handwritten signature in black ink, appearing to be "Bennett L. Ross", written over the typed name. The signature is stylized with a large loop and a horizontal line extending to the right.

Bennett L. Ross

BLR:kjw

cc: Daniel Gonzalez
Michele Carey
Matt Brill
Scott Bergman
Jessica Rosenworcel
Jeremy Marcus
Julie Veach
Jeremy Miller
Ian Dillner

#583165

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No 04-00381
TRA's Data Requests
September 23, 2005
Item No 4

**ATTACHMENT
TO REQUEST NO. 4**

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91084241**

Date September 27, 2004

To Complete Local Exchange Carriers (CLEC)

Subject: CLECs – (Product/Service) - Bulk Migration Enhancement and Updates to Unbundled Network Element - Platform (UNE-P)/DS0 Wholesale Local Platform Service to UNE-Loop (UNE-L) Bulk Migration CLEC Information Package

This is to advise that effective October 29, 2004, BellSouth will offer a Web-based Scheduling Tool enhancement to be used in conjunction with UNE-P/DS0 Wholesale Local Platform to UNE-L Bulk Migration process. The Scheduling Tool will allow the CLEC to reserve due dates and number of lines to migrate by Central Office (CO) when planning for a Bulk Migration.

The availability of the Scheduling Tool will make the BellSouth UNE-P to UNE-L Bulk Migration Project Notification form unnecessary, thus eliminating the intervals for the BellSouth Customer Care Project Manager and the CLEC to negotiate due dates. Therefore, the Project Notification form will not be accepted as of October 29, 2004.

The Scheduling Tool information and parameters as well as updates to the Interval section will be contained in the UNE-P/DS0 Wholesale Local Platform to UNE-L Bulk Migration CLEC Information Package, Version 4. The CLEC Information Package will be updated and posted on October 15, 2004, and will be found on the BellSouth Interconnection Services Web site at:

<http://interconnection.bellsouth.com/guides/html/unes.html>

Please contact your BellSouth local support manager with any questions.

Sincerely,

ORIGINAL SIGNED BY PAM TIPTON FOR JERRY HENDRIX

Jerry Hendrix – Assistant Vice President
BellSouth Interconnection Services

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91085159**

Date. August 19, 2005

To Competitive Local Exchange Carriers (CLEC)

Subject: CLECs – (Product/Services and Documentation/Guides) – Enhancements to the Bulk Migration Process and Updates to the CLEC Information Packages

This is to announce that, effective August 22, 2005, the following enhancements to the Bulk Migration Process will be available:

- 1) The requirement to submit orders electronically within 24 hours of obtaining a facility reservation number is changed to 96 hours.
- 2) CLEC reservation capacity is changed from a maximum of 125 lines to 200 lines per day, per CLEC, and per Central Office (CO). *(Note the total for all CLECs combined may not exceed 200 lines per day per CO of which 70 may be migrations from Integrated Digital Loop Carrier (IDLC))*
- 3) The Scheduling Tool calendar of days available for due date reservation display is changed from a maximum of 120 days to 200 days. This means that orders could be scheduled 200 calendar days in advance of a due date

In addition, effective August 22, 2005, the following CLEC Information Packages will be updated to include the above enhancements

- Unbundled Network Element Platform (UNE-P) and DS0 Wholesale Local Platform Service to UNE-Loop (UNE-L) Bulk Migration CLEC Information Package, Version 5 *(replaces Version 4)*
- Bulk Migration (Single LSR/Bulk Arrangement) CLEC Information Package, Version 2 *(replaces Version 1)*

The CLEC Information Packages can be found on the BellSouth Interconnection Services Web Site at

<http://interconnection.bellsouth.com/guides/html/unes.html>

Please contact your BellSouth local support manager with any questions

Sincerely,

ORIGINAL SIGNED BY KRISTEN E. ROWE

Kristen E. Rowe - Director
BellSouth Interconnection Services

BellSouth Telecommunications, Inc
Tennessee Regulatory Authority
Docket No 04-00381
TRA's Data Requests
September 23, 2005
Item No 7

**ATTACHMENT
TO REQUEST NO. 7**

4Q05	Financial Report	Line Counts used in TRRO
Retail Bus	5,245	
Resale Bus	58	
Retail + Resale Bus	5,303	6,099 <-- Source Armis 43-08
UNE-P Bus	750	813 <-- Source MAREVS
ISDN Line Equivalents Bus	1,459	Included in ARMIS 43-08
Other Wholesale/Retail	98	Included in ARMIS 43-08
Retail + Resale + ISDN + Other	7,610	Diff (699)

Exclude Acc Ln Official	317
Exclude PRI official	336
Exclude BRI official and Adjust for multiplier	43
Total Exclusions	696

Adjusted Financial Report	TRRO Line Count (before adjustments)	Amt Diff % Diff
6,914	6,911	(3) -0.04%

View	Trancode	Entity	Category	Series	Precision	DEC2004
HISTORY	R	C	INSV	TALOC	1	316,657
HISTORY	R	C	INSV	PTHLOOC	1	13,982
HISTORY	P	C	INSV	ISDNBT	1	66,364
HISTORY	P	C	INSV	ISDNOC	1	10,311

316,657 Official Access Lines
335,568 PRI Official Impact
43,493 BRI Official and multiplier adjustment

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2005, a copy of the foregoing document was served on the following, via the method indicated:

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
1600 Division Street, #700
Nashville, TN 37219-8062
hwalker@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

James Murphy, Esquire
Boult, Cummings, et al.
1600 Division Street, #700
Nashville, TN 37219-8062
jmurphy@boultcummings.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Ed Phillips, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587
Edward.phillips@mail.sprint.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
don.baltimore@farrar-bates.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

John J. Heitmann
Kelley Drye & Warren
1900 19th St., NW, #500
Washington, DC 20036
jheitmann@kelleydrye.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church St., #300
Nashville, TN 37219
cwelch@farrismathews.com

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Dana Shaffer, Esquire
XO Communications, Inc.
105 Malloy Street, #100
Nashville, TN 37201
dshaffer@xo.com

